

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS R. RODELLA,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No.: 14-CR-2783 JB

MOTION FOR CONTINUANCE OF SENTENCING

Defendant Thomas Rodella, by and through his counsel of record, Robert J. Gorence and Louren Oliveros of Gorence & Oliveros, P.C., hereby requests the Court to enter an Order continuing the sentencing hearing currently set for January 21, 2015. As grounds therefore, Mr. Rodella states as follows:

1. On January 15, 2015, Mr. Rodella filed a Second Motion for New Trial (Doc. 160).
2. Mr. Rodella respectfully requests that his Second Motion for New Trial be fully briefed, that the Court hold an evidentiary hearing, and that the Court rule on the Motion prior to sentencing.
3. It is presumed that the government opposes this Motion. However, the Court should be aware that continuing the sentencing hearing pending resolution of Mr. Rodella's Second Motion for New Trial will conserve government resources as Mr. Rodella would not have to be transferred from a federal correctional institution if the Court were to conduct an evidentiary hearing with regard to his Second Motion for New Trial.

FOR THE FOREGOING REASONS, Defendant Thomas Rodella respectfully requests that the Court enter an Order continuing the sentencing hearing currently set for January 21, 2015.

Respectfully submitted,

GORENCE & OLIVEROS, P.C.

/s/ Robert J. Gorence
Robert J. Gorence
Louren Oliveros
1305 Tijeras Avenue NW
Albuquerque, NM 87102
Telephone: (505) 244-0214
Facsimile: (505) 244-0888
E-Mail: gorence@golaw.us
oliveros@golaw.us

Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been emailed by CM/ECF to the counsel of record on this 16th day of January, 2015.

/s/ Robert J. Gorence
Robert J. Gorence